

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

GARY BRICE MCBAY

PLAINTIFF

V.

CIVIL ACTION NO. 1:07CV1205-LG-RHW

HARRISON COUNTY, MISSISSIPPI BY AND  
THROUGH ITS BOARD OF SUPERVISORS;  
HARRISON COUNTY SHERIFF GEORGE PAYNE;  
WAYNE PAYNE; DIANE GATSON RILEY;  
STEVE CAMPBELL; RICK GATSON; RYAN TEEL;  
MORGAN THOMPSON; JOHN DOES 1-4;  
AMERICAN CORRECTIONAL ASSOCIATION;  
JAMES A GONDLES, JR.; UNKNOWN DEFENDANTS  
1-3 EMPLOYEES OF AMERICAN CORRECTIONAL  
ASSOCIATION; HEALTH ASSURANCE LLC AND  
UNKNOWN DEFENDANTS 1-2 EMPLOYEES OF  
AMERICAN CORRECTIONAL ASSOCIATION

DEFENDANTS

STATE OF MISSISSIPPI

COUNTY OF HARRISON

AFFIDAVIT OF STEVE CAMPBELL

PERSONALLY CAME AND APPEARED BEFORE ME the undersigned authority in and  
for the County and State aforesaid, the within named, STEVE CAMPBELL, who, after first being  
duly sworn by me on his oath, did depose and state the following:

1. My name is STEVE CAMPBELL , and I am over the age of twenty-one (21) years.  
I was a Captain with the Harrison County Sheriff's Office and I was the Captain for  
the Professional Standards Unit for the Harrison County Adult Detention Center from  
September, 2002 until January, 2008. I have personal knowledge of the matters and

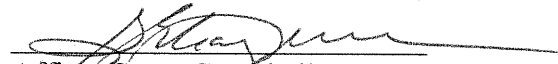


facts contained in this Affidavit and I am competent to testify to the matters stated herein.

2. As Captain for the Professional Standards Unit, I was charged with the responsibility of conducting internal administrative investigations and applicant background development. The Professional Standards Unit of the Harrison County Adult Detention Center has the primary responsibility of investigating complaints of alleged employee misconduct and complaints of excessive use of force by Harrison County Sheriff's Department officers. If the alleged incident occurred in the Harrison County Adult Detention Center booking department, my usual and customary practice would be to view surveillance recordings of the booking room at the applicable time.
3. During the relevant time of McBay's arrest and booking into the Harrison County Adult Detention Center the surveillance of the booking department was comprised of both a VHS recording system and a Digital recording system.
4. As it relates to the VHS system, this system was not a highly technical system and was purchased from a local retail store with the intent for use as a backup system, and subsequently lasted ten (10) years. Therefore, the clarity of the recordings are not of the highest quality.
5. In regards to the set up of the VHS system, the system is comprised of two (2) recorders, both which have four (4) camera angles. Each recorder would only last a specific period of time and the tape would pop out at the end of that time period and it was the responsibility of the designated booking officer to replace the tape.

6. If the tape popped out and no replacement tape was inserted, then subsequently there would be footage missing to that time frame.

I certify the above declaration is true and correct under penalty of perjury.

  
Affiant/Steve Campbell  
Harrison County, Mississippi

Sworn to and subscribed before me on this the 25<sup>th</sup> day of September, 2009.

  
Notary Public

My Commission Expires:

Sept 18, 2012

(SEAL)

